

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

SYLVIA ASH,

Defendant.

No. 1:19-cr-00780 (LAK)

**NOTICE OF MOTION TO WITHDRAW
AS COUNSEL**

PLEASE TAKE NOTICE that, pursuant to Local Rule 1.4, defense counsel G. Michael Bellinger respectfully requests that the Court order his withdrawal as counsel to defendant Sylvia Ash and cease sending docketing notifications via the ECF system. A motion to withdraw under Rule 1.4 turns on the reasons for counsel's withdrawal and the potential impact of that action on the timing of the proceeding. *See. e.g., Winkfield v. Kirschenbaum & Phillips, P.C.*, No. 12-CV-7424 (JMF), 2013 WL 371673, at 1 (S.D.N.Y Jan. 29, 2013). Mr. Bellinger seeks to withdraw because Carrie H. Cohen has assumed responsibility for the trial presently scheduled for November 30, 2021. Judge Ash remains represented by knowledgeable and competent counsel such that Mr. Bellinger's withdrawal will have no impact upon the defense of these charges. *See Whiting v. Lacara*, 187 F.3d 317, 320-21 (2d Cir. 1999) (per curiam).

Judge Ash has been advised of and consents to G. Michael Bellinger's withdrawal as counsel. Mr. Bellinger is not asserting or retaining a charging lien.

Dated: New York, New York
October 22, 2021

Respectfully submitted,
SCHIFF HARDIN LLP

/s/ G. Michael Bellinger
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